

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<i>In re:</i> Boy Scouts of America and Delaware BSA, LLC ¹ , <p style="text-align: center;">Debtors.</p>	Chapter 11 Bankruptcy Case No. 20-10343 (LLS) (Jointly Administered)
National Union Fire Insurance Co. of Pittsburgh, PA, <i>et al.</i> , <p style="text-align: center;">Appellants.</p> v. Boy Scouts of America and Delaware BSA, LLC, <p style="text-align: center;">Appellees.</p>	District Court Case No. 22-cv-01237-RGA (Jointly Consolidated) ²

**DUMAS & VAUGHN CLAIMANTS’ STATEMENT OF ISSUES ON APPEAL AND
DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 6(b)(2)(B) of the Federal Rules of Appellate Procedure, the undersigned Appellants submit the following: (i) statement of issues to be considered on appeal from the District Court’s Judgment; and (ii) designation of items to be included in the record on appeal.

I. STATEMENT OF ISSUES ON APPEAL

Appellant D & V Claimants presents the following statement of issues to be considered on appeal.

¹ The Debtors in the chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are as follows: Boy Scouts of America (6300); and Delaware BSA, LLC (4311). The Debtors’ mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

² Case numbers 22-cv-01237, 22-cv-01238, 22-cv-01239, 22-cv-01240, 22-cv-01241, 22-cv-01242, 22-cv-01243, 22-cv-01244, 22-cv-01245, 22-cv-01246, 22-cv-01247, 22-cv-01249, 22-cv-01250, 22-cv-01251, 22-cv-01252, 22-cv-01258, and 22-cv-01263 have been jointly consolidated under 22-cv-01237. The D & V Claimants’ appeal is docketed at 22-cv-01249.

1. Whether the Bankruptcy Court had jurisdiction over third-party claims against non-debtor Local Councils and Chartered Organizations such that the court could order those claims released and channeled to the Settlement Trust.

2. Whether the Bankruptcy Code authorizes the release and injunction of third-party claims against non-debtors outside of asbestos cases.

3. Even assuming the Bankruptcy Court had jurisdiction and statutory authority, whether the third-party releases and injunctions in this case met the standards courts in this Circuit have used in the past.

4. Whether the BSA Plan treats current sex abuse claimants fairly and equitably compared to Future Claimants.

II. DESIGNATIONS OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Appellants submit the following designation of items to be included in the record on appeal, which includes all exhibits, appendices, and/or addenda:

A. Bankruptcy Court Docket Entries

Item	Date Filed/Entered	Bankr. Dkt. No.	Description
1.	2/18/2020	1	Chapter 11 Voluntary Petition
2.	2/18/2020	20	Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
3.	2/18/2020	21	Disclosure Statement for the Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
4.	3/6/2020	147	National Surety Corporation's Motion (I) for Relief from the Automatic Stay or, in the Alternative, (II) to Extend the Stay
5.	3/1/2021	2293	Amended Chapter 11 Plan of

			Reorganization for Boy Scouts of America and Delaware BSA, LLC
6.	3/1/2021	2294	Disclosure Statement for the Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
7.	3/1/2021	2295	Motion to Approve Debtors' Motion for Entry of an Order Approving the Disclosure Statement and the Form and Manner of Notice
8.	4/13/2021	2592	Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
9.	4/14/2021	2594	Amended Disclosure Statement for the Second Amended Chapter 11 Plan
10.	4/14/2021	2595	Notice of Filing of Redlines of Plan and Disclosure Statement
11.	4/15/2021	2612	Debtors' Objection to the Future Claimants' Representative, the Official Committee of Tort Claimants, and the Coalition of Abused Scouts for Justice's Motion for Entry of an Order, Pursuant to 11 U.S.C. §§ 105(a) and 502(c), (I) Authorizing an Estimation of Current and Future Abuse Claims and (II) Establishing Procedures and Schedule for Estimation Proceedings
12.	5/5/2021	3154	D & V Claimants' Objection to Disclosure Statement
13.	5/6/2021	3247	Objection to Disclosure Statement Filed by Paul Mones, P.C.
14.	5/06/2021	3271	Great American's Objection to Debtors' Disclosure Statement for Second Amended Chapter 11 Plan
15.	5/06/2021	3278	Joinder by Travelers Casualty and Surety Company, Inc., to Great American's Objection to Debtors'

			Disclosure Statement
16.	5/06/2021	3285	Argonaut Insurance Company's Objection to Debtors' Disclosure Statement
17.	5/10/2021	3523	The AIG Companies' Objection to Motion for Approval of Debtors' Disclosure Statement
18.	5/10/2021	3526	Objection of the Tort Claimants' Committee to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Form of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief
19.	5/10/2021	3549	The Allianz Insurers' Objection to the Debtors' Disclosure Statement
20.	5/10/2021	3578	Objection of Liberty Mutual Insurance Company to the Disclosure Statement
21.	5/10/2021	3581	US Trustee's Objections to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Form of Ballots, (IV) Approving Form, Manner and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief
22.	5/12/2021	3740	Joinder of General Star Indemnity Company to the Allianz Insurers'

			Objection to the Debtors' Disclosure Statement
23.	5/12/2021	3856	Century Indemnity Company's Objections to the Debtors' Disclosure Statement
24.	5/16/2021	4107	Proposed Amendments to Second Amended Chapter 11 Plan of Reorganization for Boy Scouts of America
25.	5/21/2021	4716	Transcript regarding Hearing Held 5/19/2021 Re: Disclosure Statement
26.	6/1/2021	5171	Supplemental Objection to the Adequacy of Debtors' Disclosure Statement: Letter from SA 29655, Filed by D & V Claimants
27.	6/18/2021	5368	Third Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
28.	6/18/2021	5371	Amended Chapter 11 Combined Plan and Disclosure Statement
29.	6/17/2021	5372	Notice of Filing of Redlines of Third Amended Plan and Proposed Amendments to Disclosure Statement
30.	7/1/2021	5466	Motion for Entry of an Order Authorizing The Debtors To Enter Into and Perform under the Restructuring Support Agreement
31.	7/2/2021	5484	Fourth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
32.	7/2/2021	5485	Amended Disclosure Statement for Fourth Amended Chapter 11 Plan of Reorganization
33.	7/2/2021	5486	Notice of Filing of Redlines of Fourth amended Plan and Amended Disclosure Statement

34.	7/8/2021	5529	Transcript regarding Hearing Held 7/7/2021 Re: Status Conference
35.	7/22/2021	5684	Certain Insurers Objection to Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform under the Restructuring Support Agreement
36.	7/22/2021	5707	[SEALED] Objection to the Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform Under the Restructuring Support Agreement
37.	7/22/2021	5708	[SEALED] Declaration of Daniel Shamah in Support of Century's Objections to Debtors' Motion for Entry of Order Authorizing Debtors to Enter into and Perform under the Restructuring Support Agreement
38.	7/23/2021	5723	Final Redacted Version of Insurers' Objection to the Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter Into and Perform under the Restructuring Support Agreement
39.	7/26/2021	5759	Debtors Omnibus Reply in Further Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Enter Into and Perform under the Restructuring Support Agreement
40.	7/26/2021	5760	Supplemental Brief of Coalition of Abused Scouts for Justice, Official Committee of Tort Claimants, and Future Claims Representative In Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Enter Into and Perform under the Restructuring Support Agreement
41.	8/09/2021	5925	Hartford's Supplement to Objection to Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter into

			and Perform Under the Restructuring Support Agreement
42.	8/9/2021	5932	Redacted Version of Supplemental Objection of Century Indemnity to Motion to Authorize Debtors' Motion for Entry of an Order Authorizing the Debtors to Enter into and Perform under the Restructuring Support Agreement
43.	8/9/2021	5934	Certain Excess Insurers' Joinder in Century's Supplemental Objection
44.	8/9/2021	5935	AIG's Joinder to Century's Supplemental Objection and Partial Joinder to Hartford's Supplemental Objection
45.	8/11/2021	5961	Debtors' Motion for Leave to file Debtors' Response to Certain Supplemental Objections
46.	8/16/2021	6030	Dumas & Vaughn Claimants' Supplemental Objection to the Adequacy of Debtors' Disclosure Statement
47.	8/17/2021	6052	Certain Insurers' Supplemental Objection to Motion for Approval of Debtors' Disclosure Statement
48.	8/17/2021	6053	Joinder of Arch Insurance Company to Certain Insurers' Objections
49.	8/17/2021	6055	The Allianz Insurers' Joinder to the Certain Insurers' Supplemental Objection to Disclosure Statement
50.	8/17/2021	6056	Certain Excess Insurers' Supplemental Objection to Debtors' Disclosure Statement
51.	8/17/2021	6057	Joinder and Supplemental Objection of Liberty Mutual Insurance Company to the Disclosure Statement
52.	8/17/2021	6062	Certain Insurers' Superseding Objections to the Disclosure Statement

			for Debtors' Fourth Amended Plan
53.	8/18/2021	6083	Century's Objections to the Debtors' Disclosure Statement
54.	8/20/2021	6098	Transcript regarding Hearing Held 8/19/2021 Re: Ruling on RSA Motion
55.	9/15/2021	6212	Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
56.	9/15/2021	6213	Amended Disclosure Statement for the Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
57.	9/15/2021	6222	TCC's Motion to Adjourn the Hearing to Consider Approval of the Disclosure Statement
58.	9/16/2021	6247	Joinder of Dumas & Vaughn to the TCC's Motion to Adjourn the Hearing to Consider Approval of the Disclosure Statement
59.	9/16/2021	6249	Debtors' Omnibus Reply in Support of Debtors' Motion for Entry of an Order Approving Disclosure Statement
60.	9/27/2021	6377	Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
61.	9/27/2021	6383	Amended Disclosure Statement for the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
62.	9/29/2021	6416	Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
63.	9/29/2021	6419	Amended Disclosure Statement for the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC

64.	9/29/2021	6429	Modified Fifth Amended Chapter 11 Plan of Reorganization
65.	9/29/2021	6430	Redline of Modified Fifth Amended Chapter 11 Plan of Reorganization
66.	9/29/2021	6431	Amended Disclosure Statement
67.	9/30/2021	6432	Redline of the Amended Disclosure Statement
68.	9/30/2021	6436	Transcript regarding Hearing Held 9/28/2021 Re: Disclosure Statement
69.	9/30/2021	6438	Order Approving the Disclosure Statement and Notice
70.	9/30/2021	6443	Solicitation Version Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
71.	9/30/2021	6445	Solicitation Version Amended Disclosure Statement for the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
72.	12/08/2021	7611	Verified Statement filed by D & V Claimants (redacted)
73.	12/18/2021	7832	Second Modified Fifth Amended Chapter 11 Plan of Reorganization
74.	12/18/2021	7833	Second Modified Fifth Amended Chapter 11 Plan, and Blackline
75.	12/18/2021	7834	Second Modified Fifth Amended Chapter 11 Plan, and Blackline
76.	1/4/2022	8141	Declaration of Catherine Nownes-Whitaker of Omni Agent Solutions Regarding the Solicitation of Votes and Preliminary Tabulation of Ballots Cast on the Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC

77.	1/07/2022	8190	The Official Committee of Tort Claimants' Status Report Re: Second Modified Fifth Amended Chapter 11 Plan of Reorganization
78.	1/7/2022	8210	Joinder of the Zalkin Law Firm, P.C., et al., to the Official Committee of Tort Claimants' Status Report
79.	1/11/2022	8234	Debtors' Response to the Official Committee of Tort Claimants' Status Report
80.	1/18/2022	8345	Declaration of Catherine Nownes-Whitaker of Omni Agent Solutions Regarding the Solicitation of Votes and Final Tabulation of Ballots Cast on the Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
81.	1/18/2022	8346	Notice of Filing of Solicitation Changes in Connection with Declaration of Catherine Nownes-Whitaker of Omni Agent Solutions Regarding the Solicitation of Votes and Final Tabulation of Ballots Cast on the Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
82.	2/4/2022	8683	Objection of the Official Committee of Unsecured Creditors for the Archbishop of Agana (Bankr. D. Guam 19-00010) to the Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
83.	2/4/2022	8685	Munich Reinsurance America, Inc., Joinder to Certain Objections and Separate Objection to the Plan

84.	2/4/2022	8687	Joinder of Archbishop of Agana, a Corporation Sole, to the Roman Catholic Ad Hoc Committee's Objection to the Debtors' Second Modified Fifth Amended Chapter 11 Plan of Reorganization
85.	2/4/2022	8695	[SEALED] Certain Insurers' Objection to Confirmation of Debtors' Chapter 11 Plan
86.	2/4/2022	8696	[SEALED] Allianz Insurers' Objection to Second Modified Fifth Amended Chapter 11 Plan
87.	2/4/2022	8697	[SEALED] Appendix to Certain Insurers Objection
88.	2/4/2022	8698	[SEALED] Joinder and Objection of Liberty Mutual Insurance Company to the Second Modified Fifth Amended Chapter 11 Plan of Reorganization
89.	2/4/2022	8699	Old Republic Insurance Company Joinder to Objections and Supplemental Objection
90.	2/4/2022	8700	Joinder by Travelers and Surety Company, Inc., et al., to Allianz Insurers' Objection
91.	2/5/2022	8703	Joinder of Traders and Pacific Insurance Company to Certain Insurers' Objection
92.	2/7/2022	8708	Lujan Claimants' Objection to Second Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC, and Joinder in Objection Filed by Guam Committee
93.	2/7/2022	8710	United States Trustee's Objection to Confirmation of the Second Modified Fifth Amended Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC

94.	2/9/2022	8744	Dumas & Vaughn Claimants' Objection to Confirmation of the Second Modified Fifth Amended Chapter 11 Plan
95.	2/9/2022	8763	Joinder and Objection of Liberty Mutual Insurance Company to the Second Modified Fifth Amended Chapter 11 Plan of Reorganization
96.	2/10/2022	8772	Eleventh Mediator's Report
97.	2/10/2022	8778	Allianz Insurers' Objection to Second Modified Fifth Amended Chapter 11 Plan
98.	2/10/2022	8785	Certain Insurers' Statement in Advance of February 11, 2022 Status Conference
99.	2/11/2022	8793	Proposed Redacted Version of Certain Insurers Objection to Confirmation of Debtors Chapter 11 Plan
100.	2/14/2022	8811	Unsealed Joint FCR and Coalition Motion for Entry of an Order Striking Portions of Bates Reports and Precluding Testimony Related to Improper Valuation Opinion
101.	2/15/2022	8812	Unsealed Version of the Limited Objection of the Tort Claimants' Committee to Findings Related to the Valuation of Abuse Claims
102.	2/15/2022	8813	Third Modified Fifth Amended Chapter 11 Plan of Reorganization
103.	2/15/2022	8814	Third Modified Fifth Amended Chapter 11 Plan of Reorganization, and Blackline
104.	2/15/2022	8815	Fourth Amended Plan Supplement
105.	2/15/2022	8816	Exhibits I-1 and J-1 to Third Modified Fifth Amended Chapter 11 Plan
106.	2/15/2022	8817	Exhibits I-2, I-3, I-4, and J-2 to Third Modified fifth Amended Chapter 11 Plan

107.	2/15/2022	8819	Transcript regarding Hearing Held 2/11/2022 Re: Status Conference
108.	2/15/2022	8825	Supplement to Appendix to Certain Insurers' Objection to Confirmation
109.	2/15/2022	8830	Order (I) Amended and Scheduling Certain Supplemental Dates and Deadlines in Connection with Confirmation of the Debtors' Plan of Reorganization and (II) Approving a Limited Supplemental Voting Deadline for Class 8 Direct Abuse Claims and Class 9 Indirect Abuse Claims
110.	2/16/2022	8858	Amended Proposed Redacted Versions of Certain Insurers Objection to Confirmation of Debtors Chapter 11 Plan and Appendix
111.	2/18/2022	8894	Order Approving Form and Manner of Notice of Supplemental Disclosure Regarding Plan Modifications
112.	2/18/2022	8904	Supplemental Disclosure Regarding Plan Modifications and Summary of Chartered Organization Options under the Debtors' Modified Chapter 11 Plan of Reorganization, Opt-Out Election Procedures for Participating Chartered Organizations, and Supplemental Voting Deadline of March 7, 2022 at 4:00 p. m. (Eastern Time) for Holders of Class 9 Indirect Abuse Claims
113.	2/18/2022	8905	Notice of Supplemental Voting Deadline of March 7, 2022 at 4:00 p.m. (Eastern Time) for Holders of Class 8 Direct Abuse Claims and Limited Disclosure Regarding Changes in Debtors' Chapter 11 Plan of Reorganization Filed by Boy Scouts of America
114.	2/18/2022	8907	Notice of Filing of Exhibits I-2, I-3, I-4 and J-2 to Debtors' Third Modified Fifth

			Amended Chapter 11 Plan of Reorganization
115.	2/18/2022	8908	Notice of Filing of Exhibit J-1 to Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization
116.	2/18/2022	8910	Notice of Errata Retarding Certain Provisions in Debtors' Third Modified Fifth Amended Chapter 11 Plan of Reorganization
117.	2/25/2022	9009	Transcript regarding Hearing Held 2/24/2022 Re: Status Conference
118.	2/25/2022	9017	Supplemental Objection to Confirmation of Plan Filed on Behalf of Abuse Claimant SA-29655, Filed by D & V Claimants
119.	2/25/2022	9023	Supplemental Objection of the Official Committee of Unsecured Creditors for the Archbishop of Agana (Bankr. D. Guam 19-00010) to the Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
120.	2/25/2022	9031	Lujan Claimants' Supplemental Objection to Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC, and Joinder in Objections of United States Trustee and Guam Committee
121.	2/25/2022	9033	Certain Insurers Supplemental Objection to Confirmation of Plan
122.	3/2/2022	9097	Fifth Amended Plan Supplement
123.	3/2/2022	9101	[SEALED] Certain Insurers' Opposition to Limited Objection of the Tort Claimants' Committee and Joint FCR and Coalition Motion Regarding Expert Reports and Valuation Opinions

124.	3/2/2022	9104	[SEALED] Declaration of Betty X. Yang in Support of Certain Insurers' Opposition
125.	3/3/2022	9118	Debtors' Response to the Joint FCR and Coalition Motion and Objection
126.	3/3/2022	9136	Transcript regarding Hearing Held 3/2/2022 Re: Motions in Limine
127.	3/7/2022	9177	Unsealed Versions of Certain Insurers' Opposition and Declaration
128.	3/9/2022	9252	Transcript regarding Hearing Held 3/8/2022 Re: Pretrial Conference
129.	3/10/2022	9273	Declaration of Bruce Griggs
130.	3/10/2022	9274	Declaration of Michael Burnett
131.	3/10/2022	9275	Supplemental Declaration of Catherine Nownes-Whitaker
132.	3/11/2022	9279	Declaration of Devang Desai
133.	3/11/2022	9280	Declaration of Brian Whittman
134.	3/11/2022	9285	Final Pretrial Order for the Plan Confirmation Hearing
135.	3/12/2022	9309	Declaration of Adrian Azer
136.	3/13/2022	9311	Certain Insurers' Evidentiary Objections to Witness Declarations
137.	3/13/2022	9312	Limited Objection of the Official Committee of Unsecured Creditors for the Archbishop of Agana (Bankr. D. Guam 19-00010) to the Declaration of Brian Whittman in Support of Confirmation of the Third Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC
138.	3/13/2022	9313	Lujan Claimants Joinder in Objections of Roman Catholic ad hoc Committee and Guam Committee to Declaration of

			Brian Whittman
139.	3/14/2022	9316	Declaration of William S. Sugden
140.	3/14/2022	9317	Declaration of Makeda Murray
141.	3/15/2022	9337	Objection of Certain Insurers to the Declaration of Adrian Azer
142.	3/15/2022	9339	Debtors' Response to the Certain Insurers' Evidentiary Objection to Declaration of Bruce Griggs
143.	3/15/2022	9341	Transcript regarding Hearing Held 3/14/2022 RE: Confirmation (Day 1).
144.	3/16/2022	9348	Debtors' Response to Objection of the Certain Insurers to the Declaration of Adrian Azer
145.	3/16/2022	9354	Transcript regarding Hearing Held 3/16/2022 RE: Confirmation (Day 2).
146.	3/17/2022	9368	Certain Insurers' Evidentiary Objections to Witness Declarations
147.	3/17/2022	9388	Declaration of Charles E Bates
148.	3/18/2022	9389	Transcript regarding Hearing Held 3/16/2022 RE: Confirmation (Day 3).
149.	3/18/2022	9391	Debtors' Response to Certain Insurers' Evidentiary Objections
150.	3/19/2022	9395	Declaration of James L. Patton, Jr.
151.	3/19/2022	9396	Declaration of Aaron Lundberg
152.	3/19/2022	9397	Declaration of Catherine Nownes-Whitaker
153.	3/19/2022	9398	Declaration of Nancy Gutzler
154.	3/19/2022	9400	Declaration of Jessica Horewitz
155.	3/19/2022	9401	Declaration of Paul Rytting
156.	3/20/2022	9402	Certain Insurers' Evidentiary Objections to Witness Declarations

157.	3/21/2022	9403	Debtors' Response to Certain Insurers' Evidentiary Objections
158.	3/21/2022	9404	Certain Insurers' Evidentiary Objections to Witness Declarations
159.	3/21/2022	9406	Transcript Regarding Hearing Held 3/18/2022 RE: Confirmation (Day 4).
160.	3/21/2022	9407	Transcript Regarding Hearing Held 3/18/2022 RE: Confirmation (Day 5).
161.	3/21/2022	9408	Transcript Regarding Hearing Held 03/17/2022 RE: Confirmation Hearing.
162.	3/21/2022	9409	Transcript Regarding Hearing Held 03/18/2022 RE: Confirmation Hearing.
163.	3/21/2022	9411	Agreed Order Regarding Certain Insurers' Motions in Limine
164.	3/22/2022	9426	Certain Insurers' Evidentiary Objections to Witness Declarations
165.	3/22/2022	9428	Future Claimants' Representative's Response to Certain Insurers' Evidentiary Objections
166.	3/22/2022	9429	Debtors' Response to Certain Insurers' Evidentiary Objections
167.	3/23/2022	9446	Declaration of Andrew Hammond
168.	3/23/2022	9449	Declaration of Paul Rytting
169.	3/23/2022	9454	Transcript Regarding Hearing Held 3/21/2022 RE: Confirmation (Day 6).
170.	3/23/2022	9455	Transcript Regarding Hearing Held 3/22/2022 RE: Confirmation (Day 7).
171.	3/24/2022	9481	Declaration of Jason P. Amala
172.	3/25/2022	9482	Transcript Regarding Hearing Held 3/23/2022 RE: Confirmation (Day 8).
173.	3/25/2022	9490	Transcript Regarding Hearing Held 03/24/22 RE: Confirmation (Day 9).
174.	3/25/2022	9491	Declaration of Tancred Schiavoni

175.	3/28/2022	9497	Transcript Regarding Hearing Held 03/25/2022 RE: Trail.
176.	3/29/2022	9507	Declaration Concerning Certification of Records by Liberty Mutual
177.	3/29/2022	9508	Stipulation Between Debtors, Century, Hartford, Zurich, and Clarendon
178.	3/29/2022	9509	Stipulation Between Debtors, Settling Insurers, and Certain Insurers Regarding Admissibility of Insurance Policies
179.	3/30/2022	9517	Transcript Regarding Hearing Held 03/28/2022 RE: Confirmation (Day 11).
180.	3/30/2022	9529	Stipulation Between Debtors and Certain Insurers Regarding Admission of Insurance Policies
181.	3/31/2022	9530	Transcript Regarding Hearing Held 3/29/2022 RE: Confirmation (Day 12).
182.	4/1/2022	9544	Transcript Regarding Hearing Held 3/29/2022 RE: Confirmation (Day 13).
183.	4/4/2022	9562	Transcript Regarding Hearing Held 3/30/2022 RE: Confirmation (Day 13).
184.	4/4/2022	9563	Transcript Regarding Hearing Held 3/31/2022 RE: Confirmation (Day 14).
185.	4/4/2022	9564	Transcript Regarding Hearing Held 4/1/2022 RE: Confirmation (Day 15).
186.	4/4/2022	9576	Stipulation Between Debtors and Certain Insurers Regarding Admissibility of Exhibits
187.	4/5/2022	9578	Transcript Regarding Hearing Held 4/4/2022 RE: Confirmation (Day 16).
188.	4/5/2022	9591	Stipulation Between Debtors and Lujan Claimants Regarding Admissibility of Exhibits
189.	4/5/2022	9594	Sixth Amended Plan Supplement
190.	4/8/2022	9616	Transcript Regarding Hearing Held

			4/6/2022 RE: Confirmation (Day 17).
191.	4/13/2022	9638	Transcript Regarding Hearing Held 4/7/2022 RE: Confirmation (Day 18).
192.	4/13/2022	9639	Transcript Regarding Hearing Held 4/11/2022 RE: Confirmation (Day 19).
193.	4/14/2022	9646	Transcript Regarding Hearing Held 4/12/2022 RE: Confirmation (Day 20).
194.	4/14/2022	9648	Transcript Regarding Hearing Held 4/13/2022 RE: Confirmation (Day 21).
195.	4/18/2022	9656	Transcript Regarding Hearing Held 4/14/2022 RE: Confirmation (Day 22).
196.	4/20/2022	9673	Order Regarding Stipulation
197.	4/20/2022	9674	Order Regarding Stipulation
198.	4/20/2022	9675	Order Regarding Stipulation
199.	4/20/2022	9676	Order Regarding Stipulation
200.	4/20/2022	9677	Order Regarding Stipulation
201.	4/21/2022	9689	Statement Regarding Closing Argument of Liberty Mutual Insurance Company
202.	4/21/2022	9690	Letter from Claimants Regarding Liberty Mutual's Objection
203.	04/21/2022	9693	Letter from Delia Lijan Wolff and Christopher Loizides in Response to D.I. 9655
204.	4/22/2022	9696	Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications)
205.	4/22/2022	9697	Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications), and Blackline
206.	4/22/2022	9798	Seventh Amended Plan Supplement
207.	4/22/2022	9699	Revised Proposed Findings of Fact, Conclusions of Law, and Order Confirming the Third Modified Fifth

			Amended Chapter 11 Plan of Reorganization (with Technical Modifications), and Blackline
208.	4/27/2022	9746	Certain Insurers' Letter Response
209.	7/29/2022	10136	Opinion
210.	08/11/2022	10177	Corrected Thirteenth Mediator's Report
211.	08/11/2022	10178	Notice of Corrected Thirteenth Mediator's Report Regarding Modifications to the Plan and Confirmation Order
212.	8/12/2022	10188	Debtors' Motion to Amend and Supplement Findings of Fact and Conclusions of Law in Confirmation Opinion
213.	8/15/2022	10192	Certain Insurers' Objection to Debtors' Motion to Shorten Notice
214.	08/15/2022	10195	Notice of the Debtors' Motion to Amend and Supplement the Findings of Fact and Conclusions of Law in the Confirmation Opinion
215.	8/19/2022	10215	Transcript Regarding Hearing Held 8/18/2022
216.	08/24/2022	10239	Dumas & Vaughn Claimants' Response to Debtors' Motion to Amend and Supplement the Findings of Fact and Conclusions of Law in the Confirmation Opinion and Objections to Proposed Confirmation Order
217.	08/24/2022	10246	Lujan Claimants' Objection to Debtor's Motion to Amend and Supplement the Findings of Fact and Conclusions of Law in the Confirmation Opinion
218.	8/24/2022	10247	Certain Insurers' Objection to Motion to Amend and Supplement The Findings of Fact and Conclusions of Law
219.	8/29/2022	10258	Debtors' Omnibus Reply in Support of

			Debtors Motion to Amend and Supplement Findings of Fact and Conclusions of Law
220.	8/29/2022	10259	Joint Reply of Tort Claimants' Committee, Coalition of Abused Scouts for Justice, Pfau Cochran Vertetis Amala PLLC and Zalkin Law Firm, PC. And the Future Claimants Representative to Certain Insurers' Objection
221.	8/29/2022	10262	Chapter 11 Plan of Reorganization Third Modified Fifth Amended Chapter 11 Plan of Reorganization (With Technical Modifications)
222.	8/29/2022	10265	Notice of Filing of Revised Supplemental Findings of Fact and Conclusions of Law
223.	9/2/2022	10288	Transcript Regarding Hearing Held 9/1/2022
224.	9/6/2022	10295	Notice of Filing of Further Revised Supplemental Findings of Fact and Conclusions of Law
225.	9/6/2022	10296	Chapter 11 Plan of Reorganization // Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications
226.	9/6/2022	10297	Notice of Filing of Blackline of Conformed Debtors Third Modified Fifth Amended Chapter 11 Plan of Reorganization
227.	09/06/2022	10299	Century's Statement Regarding the Debtors' Proposed Supplemental Findings of Fact and Conclusions of Law and Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (With Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC

228.	9/7/2022	10304	Letter from The Hon. Judge Silverstein re: Language for Paragraph 51(b)
229.	9/8/2022	10316	Supplemental Findings of Fact and Conclusions of Law and Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (with Technical Modifications)
230.	9/8/2022	10317	Transcript Regarding Hearing Held 9/7/2022
231.	09/12/2022	10327	Order Releasing Pre-Petition Century/Chubb Claims Pursuant to Century and Chubb Companies Insurance Settlement Agreements (“Century Order”)
232.	09/16/2022	10358	Notice of Entry of Order Confirming the Third Modified Fifth Amended Chapter 11 Plan of Reorganization (With Technical Modifications) for Boy Scouts of America and Delaware BSA, LLC
233.	9/21/2022	10378	Notice of Appeal filed by National Union Fire Insurance Company of Pittsburgh, PA, <i>et al.</i>
234.	9/21/2022	10379	Notice of Appeal filed by Travelers Casualty and Surety Company, Inc., <i>et al.</i>
235.	9/21/2022	10382	Notice of Appeal filed by Continental Insurance Company, <i>et al.</i>
236.	9/21/2022	10384	Notice of Appeal filed by Allianz Global Risks US Insurance Company, <i>et al.</i>
237.	9/21/2022	10386	Notice of Appeal filed by Argonaut Insurance Company and Colony Insurance Company
238.	9/21/2022	10388	Notice of Appeal filed by Arrowood Indemnity Company

239.	9/21/2022	10391	Notice of Appeal filed by Liberty Mutual Insurance Company, <i>et al.</i>
240.	9/21/2022	10392	Notice of Appeal filed by Old Republic Insurance Company
241.	9/21/2022	10393	Notice of Appeal filed by General Star Indemnity Company
242.	9/21/2022	10396	Notice of Appeal filed by Indian Harbor Insurance Company
243.	9/21/2022	10398	Notice of Appeal filed by Munich Reinsurance Company America, Inc.
244.	9/21/2022	10401	Notice of Appeal filed by Arch Insurance Company
245.	9/21/2022	10403	Notice of Appeal filed by Great American Assurance Company, <i>et al.</i>
246.	9/21/2022	10405	Notice of Appeal filed by Gemini Insurance Company
247.	9/21/2022	10407	Notice of Appeal filed by Traders and Pacific Insurance Company, <i>et al.</i>
248.	09/22/2022	10412	Notice of Appeal filed by Dumas & Vaughn Claimants
249.	9/22/2022	10454	Notice of Appeal of Lujan Claimants

B. District Court Docket Entries

Pre-Consolidated Appeal: <i>Dumas & Vaughn Claimants v. Boy Scouts of America and Delaware BSA, LLC</i> , No. 22-cv-01249-RGA			
Item	Date Filed/Entered	Dis. Ct. Dkt. No.	Description
250.	9/22/2022	1	Notice of Appeal
251.	9/22/2022	2	Notice of Docketing

252.	9/27/2022	3	Joint Motion for Consolidation and to Approve Stipulation Regarding Appeals from Order Confirming Plan of Reorganization of Boy Scouts of America and Delaware BSA, LLC
253.	10/03/2022	6	Statement of Issues on Appeal from Bankruptcy Court and Designation of Record
254.	10/03/2022	7	District of Delaware Bankruptcy Court Appeal Transmittal Sheet and List of Appellees
255.	10/6/2022	12	Joint Designation of Additional Items to be Included in the Record on Appeal
256.	10/17/2022	13	PROPOSED Order re Motion on Stipulation Regarding Appeals from Order Confirming Plan of Reorganization of Boy Scouts of America and Delaware BSA, LLC
257.	10/17/2022	14	Order Granting Motion on Stipulation Regarding Appeal From Order Confirming Plan of Reorganization of Boy Scouts of America and Delaware BSA, LLC
258.	1/19/2023	15	Official Transcript of Scheduling Conference held on 10/7/22 before Judge Richard G. Andrews

Consolidated Appeal: <i>National Union Fire Insurance Co. of Pittsburgh PA et al. v. Boy Scouts of America and Delaware BSA, LLC</i>, No. 22-cv-01237-RGA³			
Item	Date Filed/Entered	Dis. Ct. Dkt. No.	Description
259.	11/07/2022	41	Appellant's Brief by The Lujan Claimants
260.	11/07/2022	41	Appellant's Brief by The D & V Claimants
261.	11/07/2022	42	Appendix re Appellant's Brief by The D & V Claimants
262.	11/07/2022	43	Appellant's Brief by Liberty and Allianz Insurers
263.	11/07/2022	44	Appendix re Appellant's Brief by The Lujan Claimants
264.	11/07/2022	45	Appellant's Brief by Certain Insurers
265.	11/07/2022	46	[SEALED] Appendix re Appellant's Brief by The D & V Claimants
266.	11/07/2022	47	Notice of Filing Hard Drive Containing Appendix of Certain Insurers
267.	11/08/2022	51	Certificate of Service for [SEALED] Appendix re Appellant's Brief by The D & V Claimants
268.	11/14/2022	54	Motion for Leave to File Exhibits Identified in Appendix Under Seal - filed by D & V Claimants
269.	11/14/2022	55	Hard Drive Containing Appendix of Certain Insurers

³ Dumas & Vaughn Claimants were originally assigned District Court Case No. 22-cv-01249. On October 17, 2022, their appeal was procedurally consolidated with appeals of all Appellants in Case No. 22-cv-01237, with the Court directing that “[a]ll further filings with this Court will be docketed under the Master Case Number.” See Order Granting Motion, *National Union Fire Ins. Co. of Pittsburgh PA, et al. v. Boy Scouts of America and Delaware BSA, LLC*, No. 22-cv-01237-RGA (D. Del.) (Dkt. No. 22). D & V Claimants have not listed the District Court designations of all Appellants, but join in the designations of other Appellants as if set forth in full.

270.	11/14/2022	56	Statement re Motion for Leave to File Exhibits Identified in Appendix Under Seal - filed by D & V Claimants
271.	11/14/2022	57	Notice of Filing Appendix Exhibits ADV 217-222 of Appellant D & V Claimants
272.	11/14/2022	58	Redacted Version of Appendix by D & V Claimants
273.	12/7/2022	66	Appellee's Brief by BSA
274.	12/7/2022	67	Appellee's Brief by Ad Hoc Committee of Local Councils of the Boy Scouts of America
275.	12/7/2022	69	Appendix of Ad Hoc Committee of Local Councils of the Boy Scouts of America
276.	12/7/2022	81	Appellee's Brief by FCR
277.	12/7/2022	85	Appendix of FCR
278.	12/7/2022	86	Appellee's Brief by First State Insurance Company, Hartford Accident and Indemnity Company, Navigators Specialty Insurance Company, Twin City Fire Insurance Company
279.	12/7/2022	88	Compendium of Unreported Decisions
280.	12/7/2022	89	Appellee's Brief by Coalition, Pfau Cochran Vertetis Amala PLLC, the Zalkin Law Firm, P.C., and the TCC
281.	12/9/2022	95	Appendix of BSA: Volume 1
282.	12/9/2022	96	Appendix of BSA: Volume 2
283.	12/9/2022	97	Appendix of BSA: Volume 3
284.	12/9/2022	98	Appendix of BSA: Volume 4
285.	12/9/2022	99	Appendix of BSA: Volume 5
286.	12/14/2022	103	Notice of Filing Multimedia Materials
287.	12/14/2022	104	[PROPOSED] Order Approving

			Stipulation Regarding Designation of Certain Items to be Included in the Record on Appeal Pursuant to Federal Rule of Bankruptcy Procedure 8009(e)
288.	12/14/2022	105	Multimedia Documents
289.	12/14/2022	106	Order Approving Stipulation Regarding Designation of Certain Items to be Included in the Record on Appeal Pursuant to Federal Rule of Bankruptcy Procedure 8009(e)
290.	12/21/2022	109	Reply Brief by Certain Insurers
291.	12/21/2022	110	Reply Brief by D & V Claimants
292.	12/21/2022	111	Reply Brief by Allianz and Liberty Insurers
293.	12/21/2022	113	Reply Brief by The Lujan Claimants
294.	12/23/2022	115	Letter to Hon. Richard G. Andrews regarding oral argument
295.	1/4/2023	118	[REDACTED] Appendix of BSA: Volume 6.
296.	1/05/2023	120	Oral Order Regarding Redactions
297.	1/10/2023	121	Oral Order Regarding Argument
298.	1/11/2023	122	Order Granting [D & V Claimants' Motion] MOTION for Leave to File Exhibits Identified in Appendix Under Seal
299.	1/13/2023	123	Motion of the Certain Insurers to Supplement the Record
300.	1/13/2023	124	Notice of Filing Multimedia Materials
301.	1/17/2023	125	Multimedia Document
302.	1/19/2023	127	Official Transcript of Scheduling Conference held on 10/7/22 before Judge Richard G. Andrews.
303.	1/27/2023	128	Boy Scouts of America's Opposition to the Certain Insurers' Motion to

			Supplement the Record
304.	1/27/2023	129	Joinder of the Official Committee of Tort Claimants, Pfau Cochran Vertetis Amala PLLC, and the Zalkin Law Firm, P.C. to the BSA's Opposition to the Certain Insurers' Motion to Supplement the Record
305.	2/1/2023	130	Letter to Hon. Richard G. Andrews Regarding Third Circuit Decision
306.	2/2/2023	131	Letter to Hon. Richard G. Andrews Regarding Third Circuit Decision
307.	2/3/2023	132	Reply of the Certain Insurers in Further Support of Motion to Supplement the Record
308.	3/7/2023	144	Official Transcript of Oral Argument held on 2/9/23 before Judge Richard G. Andrews
309.	3/7/2023	145	Official Transcript of Oral Argument held on 2/10/23 before Judge Richard G. Andrews
310.	3/28/2023	150	Opinion
311.	3/28/2023	151	Order
312.	3/31/2023	152	Emergency Motion for Stay by Certain Insurers
313.	3/31/2023	153	Affidavit of Deirdre M. Richards
314.	4/01/2023	154	Emergency Motion for Stay by D & V Claimants
315.	4/01/2023	156	Emergency Motion for Stay by The Lujan Claimants
316.	4/01/2023	156	Affidavit of Christopher D. Loizides
317.	4.03/2023	159	Affidavit of Charles J. Brown, III
318.	4/4/2023	162	Oral Order
319.	4/6/2023	164	Response to Emergency Motion

320.	4/6/2023	165	Declaration of Brian Whittman
321.	4/6/2023	166	Declaration of Stephen Ehmann
322.	4/6/2023	167	Declaration of David Stern
323.	4/6/2023	168	Declaration of Evan Smola
324.	4/6/2023	169	Declaration of Irwin Zalkin
325.	4/6/2023	170	Declaration of Peter Janci
326.	4/6/2023	171	Declaration of Patrick Stoneking
327.	4/6/2023	172	Declaration of Paul Mones
328.	4/6/2023	173	Declaration of Jordan Merson
329.	4/7/2023	174	Reply to Emergency Motion by Certain Insurers
330.	4/07/2023	175	Reply to Emergency Motion by D & V Claimants
331.	4/07/2023	176	Reply to Emergency Motion by The Lujan Claimants
332.	4/10/2023	177	Notice of Appeal by The Lujan Claimants
333.	4/10/2023	178	Notice of Appeal filed by Liberty Insurance Underwriters Inc., et al.
334.	4/10/2023	179	Notice of Appeal by D & V Claimants
335.	4/10/2023	180	Notice of Appeal filed by Columbia Casualty Co., et al.
336.	4/10/2023	181	Notice of Appeal filed by Landmark Insurance Company, et al.
337.	4/10/2023	182	Notice of Appeal filed by Indian Harbor Insurance Company
338.	4/10/2023	183	Notice of Appeal filed by Old Republic General Insurance Group
339.	4/10/2023	184	Notice of Appeal filed by Travelers Casualty and Surety Company, Inc.
340.	4/10/2023	185	Notice of Appeal filed by Great

			American Assurance Company, et al.
341.	4/10/2023	186	Notice of Appeal filed by Allianz Global Risks US Insurance Company, et al.
342.	4/10/2023	187	Notice of Appeal filed by Argonaut Insurance Company, et al.
343.	4/10/2023	188	Notice of Appeal filed by Gemini Insurance Company
344.	4/10/2023	189	Notice of Appeal filed by General Star Indemnity Company
345.	4/10/2023	190	Notice of Appeal filed by Arrowood Indemnity Company
346.	4/10/2023	191	Notice of Appeal filed by Endurance American Insurance Company, et al.
347.	4/11/2023	193	Memorandum Order

C. Exhibits

The parties agreed by stipulation that all exhibits admitted into the evidence at the Confirmation Hearing in the Bankruptcy Court would be designated and that the parties shall cooperate to facilitate transmittal of the record. In accordance with the instructions of the District Court, exhibits that were not docketed in the Bankruptcy Court were submitted to the District Court via multi-media filing and can be provided to the circuit clerk upon request. For avoidance of doubt, Appellants again designate all exhibits admitted into the evidence into the record for appeal. Appellants reserve the right to seek to amend or supplement the exhibits admitted into the record to the extent necessary to add any omitted exhibits.

Dated: April 24, 2023

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- and -

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